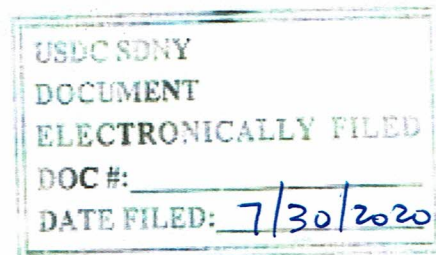


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July 29, 2020

By ECF & Email (RomanNYSDChambers@nysd.uscourts.gov)

The Honorable Nelson S. Román  
U.S. District Judge  
The Hon. Charles L. Briant Jr.  
Federal Building and United States Courthouse  
300 Quarropas Street  
White Plains, NY 10601-4150

Although Defendant does not now intend to proceed with motion practice on July 31, 2020, he reserves his right to do so at a later date if plea negotiations fall through. Clerk of the Court requested to terminate the motion (doc. 112).

Dated: July 30, 2020

SO ORDERED.

Re: *United States v. Willie Sims, et al.*, 19 Cr. 857 (NSR)-01

Dear Judge Román:

  
Nelson S. Román, U.S.D.J.

I write on behalf of Defendant Willie Sims in the above-referenced matter.

As the Court is aware, since last week the parties have been engaged in plea discussions seeking a resolution of this case. The parties have reached a tentative agreement, and the government is preparing a formal written plea agreement, which they intend to send to me within the next day, and which I will then need to review with my client. As a result, I do not intend to file motions on Friday, July 31, 2020, as the government has conditioned the plea offer on Mr. Sims not filing motions. Once the potential plea deal is finalized, the parties will contact the Court.

However, in the event that the tentative plea agreement falls apart, I respectfully request the right to seek leave to file motions. The government does not object to this application.

Respectfully submitted,

/s/ J.P.F.

Joseph P. Facciponti

cc: All counsel of record (by ECF and email)